

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NATALIE ROBINSON, individually,

Plaintiff,

v.

PROGRESSIVE CASUALTY INSURANCE
COMPANY, individually

Defendant.

Case No. 2:25-cv-00623-JLR

STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO EXTEND
INITIAL DISCLOSURES, FRCP 26(f)
CONFERENCE, AND JOINT STATUS
REPORT DEADLINES

NOTE ON MOTION CALENDAR:
MAY 27, 2025.

MOTION

1. Plaintiff filed her Complaint against Defendant on March 14, 2025 (ECF No. 1-1).
2. Defendant removed the case to this Court on April 8, 2025 (ECF No. 1).
3. Defendant Filed its Answer to the Complaint in the removed action on April 8, 2025 (ECF No. 8).
4. The Court issued its Order Regarding Initial Disclosures, Joint Status Report, Discovery, Depositions, and Early Settlement on May 22, 2025 (ECF No. 10).
5. That Order set the deadline for the FRCP 26(f) Conference as June 5, 2025, the deadline for Initial Disclosures as June 20, 2025, and the deadline for filing a Joint Status Report and Discovery Plan by June 26, 2025 (See ECF No. 10).
6. Upon receiving Order Regarding Initial Disclosures, Joint Status Report, Discovery,

STIPULATED MOTION AND ~~PROPOSED~~ ORDER TO EXTEND
INITIAL DISCLOSURES, FRCP 26(F) CONFERENCE, AND JOINT
STATUS REPORT DEADLINES - 1
NO. 2:25-cv-00623-JLR

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Depositions, and Early Settlement on May 22, 2025, counsel for Defendant wrote to counsel for Plaintiff and learned from an e-mail notification that counsel for Plaintiff was out of the office from May 22, 2025 until May 27, 2025. Counsel for Defendant is in a full day deposition on May 28, 2025. Counsel for Defendant is also out of the country from May 29, 2025 to June 9, 2025. Due to these scheduling conflicts, counsel for Plaintiff and Defendant are unable to participate in a FRCP 26(f) Conference before June 5, 2025, unable to finalize and serve Initial Disclosures before June 20, 2025, and unable to file a Joint Status Report and Discovery Plan by June 26, 2025.

7. The Parties have not previously requested an extension of deadlines.
8. The Parties seek four week extensions of the June 5, 2025 deadline for the FRCP 26(f) Conference, the June 20, 2025 deadline for Initial Disclosures, and the June 26, 2025 deadline for filing a Joint Status Report and Discovery Plan.
9. With the requested extensions, the new deadline for the FRCP 26(f) Conference would be July 3, 2025, the new deadline for Initial Disclosures as July 18, 2025, and the new deadline for filing a Joint Status Report and Discovery Plan by July 24, 2025.
10. The Order Regarding Initial Disclosures, Joint Status Report, Discovery, Depositions, and Early Settlement states, “The deadlines above may be extended only by order of the Court. Any request for an extension should be made by filing a motion or stipulated motion pursuant to Local Civil Rule 7(j).”
11. Counsel for the Parties have been discussing the possibility of an early mediation in this case. They are close to setting a timeline for that mediation which depends on the availability of the preferred mediator candidate. The Parties have “met and conferred” and agree that the requested extensions are sufficient to have the “new” deadlines met and continue to explore an early mediation in this case.
12. For these reasons, pursuant to LCR 7(j), the Parties respectfully request that the Court extend the June 5, 2025 deadline for the FRCP 26(f) Conference, the June 20, 2025 deadline for Initial Disclosures, and the June 26, 2025 deadline for filing a Joint Status

1 Report and Discovery Plan by four weeks each. With the requested extensions, the
2 new deadline for the FRCP 26(f) Conference would be July 3, 2025, the new deadline
3 for Initial Disclosures as July 18, 2025, and the new deadline for filing a Joint Status
4 Report and Discovery Plan by July 24, 2025.

5 DATED: May 27, 2025.

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ORDER

The Court orders that the Stipulated Motion is granted. The June 5, 2025 deadline for the FRCP 26(f) Conference, the June 20, 2025 deadline for Initial Disclosures, and the June 26, 2025 deadline for filing a Joint Status Report and Discovery Plan are continued four weeks each to July 3, 2025, July 18, 2025, and July 24, 2025, respectively.

DATED this 28th day of May 2025.


THE HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT COURT JUDGE

Presented by:

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